

VIA ECF

December 14, 2020

Honorable Naomi Reice Buchwald
United States District Judge
500 Pearl Street, Room 2270
New York, NY 10007

Re: *Simcha Feldman et al. v. Yechezkel Strulovitch et al.*, 20-cv-07270-NRB

JOINT LETTER

Attorney for Plaintiffs Simcha Feldman et al. and
Attorney for Defendants EIGHTEEN PROPERTIES LLC, KNICKERBOCKER LOFTS LLC, 296
COOPER LLC; WILLTROUT REALTY LLC, STAGG STUDIOS LLC, TOMPKINS 420 REALTY
LLC, 420 TOMPKINS, LLC

Dear Judge Buchwald,

Defendants EIGHTEEN PROPERTIES LLC, KNICKERBOCKER LOFTS LLC, 296 COOPER
LLC; WILLTROUT REALTY LLC, STAGG STUDIOS LLC, TOMPKINS 420 REALTY LLC, 420
TOMPKINS, LLC (the “**Defendants**”) in their previous letter filed on December 2, 2020 requested an
adjournment to file responsive pleadings to Plaintiff’s Complaint until December 15, 2020 on
Plaintiff’s counsel consent. In said letter Defendants also consented to align further with all scheduled
dates with all the other defendants in this action.

Due to the results of December 14th pre-motion conference and given permission by your Honor
to Plaintiff to file an Amended Complaint, and, in the light of judicial economy, Defendants and
Plaintiffs are jointly respectfully requesting to permit Defendants to file responsive pleadings on the
same date as it will be for the other Defendants’ responsive pleadings to Plaintiffs’ Amended
Complaint, and not to hold Defendants in default for not responding to Plaintiffs’ Complaint on
December 15, 2020.

Should Plaintiff fail to file Amended Complaint within thirty days, as permitted, Defendants
responsive pleadings will be due January 15, 2020.

Cc: all parties via NYSCEF

COHEN, LABARBERA & LANDRIGAN, LLP

/s/ Oxana Lukina

By: Oxana Lukina, Esq.

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/s/ Gerald Grunsfeld

By: Gerald Grunsfeld

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